

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

|                |   |                      |
|----------------|---|----------------------|
| UNITED STATES, | ) |                      |
|                | ) |                      |
| v.             | ) | Crim. No. 1:19cr334  |
|                | ) | Hon. Leonie Brinkema |
| XIZHI LI,      | ) |                      |
| Defendant.     | ) |                      |

DEFENDANT’S RESPONSE IN OPPOSITION TO GOVERNMENT’S SUR-REPLY  
EMERGENCY MOTION FOR PRETRIAL RELEASE

Comes now Defendant Xizhi Li, by counsel, and responds to the Government’s Sur-Reply to his Emergency Motion for Pretrial Release. Defendant further asks the Court to order an Independent Medical Examination of Mr. Li and to stop Northern Neck Regional Jail from returning Mr. Li to the facility’s general population pending outcome of such an examination. In support, Mr. Li states as follows:

As the Court is aware, on December 25, 2020, Undersigned received word from Stephen Li that his father incarcerated at Northern Neck Regional Jail was coughing up blood, presumably as a consequence of his recent Covid-19 infection. Undersigned traveled to Northern Neck Regional Jail and spoke with Mr. Li at approximately 4:00 p.m. At this time, Mr. Li complained to Undersigned of having difficulty breathing, a fever, and coughing up blood. Undersigned has twice attempted to contact Northern Neck Regional Jail to get an update on Mr. Li’s condition and treatment. Most recently, Undersigned attempted last night to contact Ms. Anne Ailor, Health Services Coordinator for Northern Neck Regional Jail. Neither Ms. Ailor nor anyone at the facility has responded to undersigned’s attempts at contact.

The information that Northern Neck Regional Jail and Ms. Ailor has selectively conveyed to the Government is diametrically opposed to Undersigned's information. Accordingly, Mr. Li asks the Court to order an Independent Medical Examination of Mr. Li and to stop Northern Neck Regional Jail from returning Mr. Li to the facilities general population pending outcome of such an examination.

Defendant asks that the Court set a hearing on this matter at its earliest convenience.

WHEREFORE, for these reasons the Court should order an Independent Medical Examination of Mr. Li and stop Northern Neck Regional Jail from returning Mr. Li to the general population pending such an examination.

Respectfully Submitted,

XIZHI LI  
By Counsel

/s/  
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Counsel for the Defendant

Certificate of Electronic Service

I hereby certify that on December 29, 2020, the foregoing was electronically filed with consequent service to AUSA David Peters.

/s/  
John C. Kiyonaga